

**THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>MICHAEL DAVID SILLS</b>	)	
<b>and MARY SILLS,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>CASE NO. 3:23-cv-00478</b>
<b>v.</b>	)	
	)	<b>JUDGE WILLIAM L. CAMPBELL, JR.</b>
	)	<b>Magistrate Judge Chip Frensley</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
<b><i>et al.</i></b>	)	<b>JURY TRIAL DEMANDED</b>
	)	
<b>Defendants.</b>	)	

**MOTION FOR LEAVE OF THE EXECUTIVE COMMITTEE OF THE SOUTHERN BAPTIST CONVENTION AND ROLLAND SLADE'S TO FILE DOCUMENT UNDER SEAL**

Pursuant to Local Rule 5.03, the Executive Committee of the Southern Baptist Convention and Rolland Slade (collectively the “ECSBC”) move to seal portions of their Response to Plaintiffs’ Statement of Additional Undisputed Facts. Specifically, No. 28 of Plaintiffs’ Statement references and quotes from a confidential mediation statement dated April 23, 2020 that was prepared on behalf of the Executive Committee and submitted to the mediator in connection with a mediation between the Executive Committee and Jennifer Lyell. The parties’ interest in maintaining the confidentiality of settlement communications outweighs the public’s interest in accessing this information. In support of this Motion, the ECSBC incorporates the reasons set forth in the accompanying Memorandum of Law.

Respectfully submitted,

*/s/ Brigid M. Carpenter*

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